

Robert P. Cummins, Esq.  
Two Canal Plaza; P.O Box 4600  
Portland, ME 04112-4600  
(o) 207 553-4712 (m) 312-622-6321  
[rpc@cumminslawfirm.com](mailto:rpc@cumminslawfirm.com)

March 2, 2022

The Honorable J. Paul Oetken  
Southern District of New York  
40 Foley Square, Room 2101  
New York, NY 10007

Re: In re Interest Rate Swaps Antitrust Litigation  
No. 16-MD-2704-JPO (S.D.N.Y.)

Dear Judge Oetken:

We represent Plaintiff Javelin Capital Markets LLC, and we write with the consent of counsel for Plaintiffs Tera Group, Inc., Tera Advanced Technologies LLC, TeraExchange, LLC and trueEX LLC (collectively, the “Platform Plaintiffs”).

Similar to the issues presented in the Class’s pending motion to reopen discovery for the limited purpose of serving spoliation-related interrogatories on JPMorgan (Dkt. 985) (“Motion”), the Platform Plaintiffs have engaged JPMorgan and all other defendants on their failures to produce responsive texts and other messages that Defendants’ employees sent or received on WhatsApp, WeChat, and other messaging platforms. Accordingly, because the Platform Plaintiffs’ interests on these discovery issues are aligned with those of the Class, we respectfully urge the Court to grant the Class’s Motion.

Respectfully submitted,

/s/ Robert P. Cummins  
Robert P. Cummins

*Counsel for Plaintiff*  
*Javelin Capital Markets LLC*

cc: Counsel of Record (via ECF)